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July 22, 2002

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Marlene H. Dortch, Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Re: Reply Comments of Fort Bend Broadcasting Co.
in MB Docket No. 02-108, RM-10418
FM Table of Allocations, Harrisville, MI.

Dear Ms. Dortch:

Transmitted herewith is an original and four copies of the above captioned pleading.

It is requested that the additional copy marked "FILE" be date-stamped and returned to us in the enclosed self-addressed stamped envelope.

Should any additional information be required, please contact this office.

Very truly yours,


Robert J. Buenzle, Counsel

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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In the Matter of) MB Docket No. 02-108
)
Amendment of Section 73.202(b)) RM-10418
Table of Allotments)
FM Broadcast Stations)
Harrisville, Michigan)

To: Assistant Chief, Audio Division
Office of Broadcast License Policy
Media Bureau

REPLY COMMENTS

On May 17, 2002, the Commission published a Notice of Proposed Rulemaking ("Notice") in the above-captioned docket. In response to that Notice, a Counterproposal was filed by Northern Michigan Radio, Inc., licensee of radio station WBYC-FM, ("WBYC") currently licensed to Atlanta, Michigan, proposing, inter alia, a termination of its operation on channel 223C1 at Atlanta and relocation of WBYC to a new allotment of channel 223C1 in Vanderbilt, Michigan, at coordinates N45-13-24, W84-35-39.

Fort Bend Broadcasting Company, licensee of radio station WOUF-FM in Beulah, Michigan ("WOUF") operates on channel 221A and on March 29, 2001, filed a "one-step upgrade" application on that channel (BPH-20010329AAE) to operate on channel 222C2 at a new site. On July 22, 2002, WOUF also filed an Amendment to that pending application, specifying a new site location at N44-24-13, W86-09-22.

WOUF is aware of certain technical problems that appear to exist in the WBYC counterproposal surrounding its failure to commit to apply for and construct a new station at the vacated community of Atlanta, and that its counterproposal may therefore be found to be fatally defective as filed. To the extent that that is the finding of the Commission as to this counterproposal (and that is what we believe the finding should be), then WOUF has no further interest in this proceeding.

Conversely, should the Commission, for any reason, give any further consideration to this counterproposal, then WOUF notes the inherent conflict between its amended site as specified in its pending application and the site for channel 223C1 in Vanderbilt as specified in the counterproposal, and as described further in the attached Engineering Statement, and in that event, requests the Commission to either require WBYC to specify new location coordinates that do not conflict with the coordinates proposed by WOUF in its pending application as amended, or, failing that, to deny the proposed new allotment by WYBC at Vanderbilt, Michigan.


Conclusion

Wherefore, WOUF submits that the WBYC counterproposal should be dismissed for failing to meet the requirement to be substantially complete as filed, or, if given further consideration, that WBYC be required to amend its Vanderbilt proposal to a site not in conflict with the pending amended

application of WOUF, or failing that, that the counterproposal of WBYC be denied.

Respectfully Submitted,

FORT BEND BROADCASTING COMPANY

by 
Robert J. Buenzle

Its Counsel

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July 23, 2002

ENGINEERING STATEMENT

The undersigned has been retained by Fort Bend Broadcasting Company to prepare this Engineering Statement in support of its Reply Comments in MM Docket 02-106 and MM Docket 02-108. In response to the Commission's Public Notice of a proposed assignment at Presque Isle, Michigan and Harrisville, Michigan a counterproposal was filed by Northern Michigan Radio, Inc., which proposed, among other things, the assignment of FM Channel 223C1 to Vanderbilt, Michigan at co-ordinates N45-13-24, W84-35-59.

On July 22, 2002 Fort Bend Broadcasting Company, licensee of Radio Station WOUF(FM), Beulah, Michigan filed a site change to its pending application, FCC File No. BPH-20010329AAE. This application seeks a one step upgrade of Radio Station WOUF(FM) to FM Channel 222C2 at a new site located at geographic co-ordinates N44-24-13, W86-09-22. This site is 5 km short spaced to the site specified in the Counterproposal filed by Northern Michigan Radio, Inc., for FM Channel 223C1 at Vanderbilt, Michigan.

The undersigned has read the foregoing statement of facts and verifies that they are true, correct and complete. My qualifications are a matter of record before the Commission and the undersigned is aware that this Engineering Statement is being filed in MM Docket 02-106 and MM Docket 02-108.

Dated this 22nd day of July 2002.

Respectfully,



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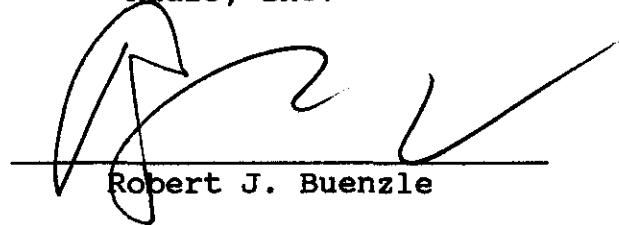
CERTIFICATE OF SERVICE

I, Robert J. Buenzle, do hereby certify that copies of the foregoing Reply Comments have been served by United States mail, postage prepaid this 23rd day of July, 2002, upon the following:

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* Also Sent By Fax